

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE CT GROUP HOLDINGS LIMITED  
FOR AN ORDER TO TAKE DISCOVERY  
FOR USE IN FOREIGN PROCEEDINGS  
PURSUANT TO 28 U.S.C. § 1782

Case No. 23-MC-00403

**DECLARATION OF EDWARD GREENO**

I, Edward Greeno, pursuant to 28 U.S.C. § 1746, hereby declare, under penalty of perjury under the laws of the United States, as follows:

1. I submit this declaration in connection with CT Group Holdings Limited (“CT Group” or “Petitioner”)’s *Ex Parte* Application and Petition For An Order To Conduct Discovery From e` Clearing House Payments Company LLC (“CHIPS”) and e` New York Federal Bank of New York (“Federal Reserve Bank” and, together with CHIPS, the “Respondents”) For Use In A Foreign Proceeding Pursuant To 28 U.S.C. § 1782 (“1782 Application”). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the 1782 Application and accompanying Memorandum of Law.

**I. DEVELOPMENTS IN THE UK PROCEEDINGS**

2. On November 30, 2023, the [REDACTED] were heard before [REDACTED] [REDACTED] e` nature of this hearing and the context for it was described in my Declaration filed November 17, 2023, filed in the present 1782 action.

3. On December 11, 2023, judgment in the [REDACTED] was handed down, and Ms. Green was denied *Norwich Pharmacal* relief against Petitioner. A copy of [REDACTED] [REDACTED] judgment is attached hereto as **Exhibit 01**.

4. Having provided judgment, [REDACTED] adjourned the hearing in order to allow further time for Ms Green apply for permission to appeal the judgment. e` relevant Order is attached hereto as **Exhibit 02**.

5. Petitioner proposes that the consideration of the 1782 Application be stayed for five weeks to allow time for the adjourned hearing to be concluded either by way of further hearing or on the papers as per paragraph 3 of the Order. If Ms. Green decides to appeal, the discovery sought by the 1782 Application will remain relevant for the purpose of that appeal.

6. Petitioner will inform the Court within 48 hours of any change in circumstances that would impact the Court's decision to either lift the proposed stay or dismiss the 1782 Application; for example, if Ms. Green does not seek permission to appeal the judgment and the UK Proceedings are concluded.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 under the laws of the United States that the foregoing is true and correct.

Executed on December 12, 2023  
in London



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Edward Greeno